

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: Joint Petition for Purchase and Sale of Assets by
the Narragansett Electric Company and the
Southern Union Company

Docket No. D-06-13

PETITION FOR INTERVENTION
Rule 17

The City of East Providence (“East Providence”), pursuant to Rule 17 of the Division of Public Utilities and Carriers’ Rules of Practice and Procedure, moves to intervene in the above-captioned matter.

In support, of its Motion to Intervene, East Providence states as follows:

1. Both petitioners are utility companies physically located within East Providence and providing utility service to the taxpayers of East Providence.
2. East Providence was a party before the Federal Energy Regulatory Commission (“FERC”) in *KeySpan LNG, L.P. and Algonquin Gas Transmission, LLC*, FERC Docket Nos. CP04-223, CP04-293 and CP04-355 (the “KeySpan LNG Proceeding”).
3. As pursuant to the KeySpan LNG Proceeding, KeySpan sought to permit an LNG marine terminal on land owned by New England Gas in the City of Providence (the “KeySpan LNG Site”) and less than one (1) mile from East Providence Waterfront Development District.
4. East Providence and others were successful in having the KeySpan LNG Proceeding dismissed by FERC.
5. KeySpan has taken an appeal in the matter encaptioned *KeySpan LNG, LP v. Federal Energy Regulatory Commission*, United States Court of Appeals for the District of Columbia Circuit, No. 06-1097. East Providence is currently intervening in said appeal.

6. In addition to owning the KeySpan LNG Site, New England Gas, upon information and belief, owns or controls additional real property in the close proximity to the Key Span LNG Site, which may well be dispositive of whether the KeySpan LNG Site can be expedited.

7. In 2003, the Rhode Island General Assembly enacted Chapters 344 and 345 of Public Laws 2003, which is known as the East Providence Waterfront Special Development District Enabling Act (the "Enabling Act").

8. The Enabling Act set the stage for the creation of the "state-local-private sector partnership" to transform over 300 acres of under utilized waterfront along the Providence and Seekonk Rivers.

9. Any expansion of KeySpan LNG Site would be contrary to and have an adverse impact on the East Providence Waterfront Development Plan.

10. Furthermore, New England Gas holds right, title and interest to real property located within the East Providence Waterfront Special Development District that must be assessed from an environmental perspective and assimilated into the East Providence Waterfront Development Plan.

Respectfully submitted,

The City of East Providence



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Dated: April 4, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was served via first-class, postage prepaid mail upon the following referenced on Exhibit A on this 4th day of April, 2006:

Wendy Smith

National Grid & Southern Union - Docket D-06-13
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